

ORIGINAL

FILED  
CLERK, U.S. DISTRICT COURT  
JUL 9 2008  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION BY DEPUTY

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ) ED CR 08- 128-56h  
Plaintiff, ) I N D I C T M E N T  
v. )  
CONSTANTINE PETER KALLAS, ) [18 U.S.C. § 201(b)(2):  
and ) Acceptance of Bribe by Public  
MARIA GABRIELA KALLAS, ) Official; 18 U.S.C. § 2(a):  
 ) Aiding and Abetting]  
Defendants. )

The Grand Jury charges:

[18 U.S.C. §§ 201(b)(2), 2(a)]

21 On or about June 26, 2008, in San Bernardino County, within the  
22 Central District of California, defendant CONSTANTINE PETER KALLAS, a  
23 public official, namely an Assistant Chief Counsel within Immigration  
24 and Customs Enforcement, a branch within the United States Department  
25 of Homeland Security, directly and indirectly did corruptly demand,  
26 seek, receive, accept, and agree to receive and accept something of  
27 value personally, in return for (1) being influenced in the  
28 performance of an official act, (2) being influenced to commit and

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1 aid in committing, and to collude in, and allow, and to make  
2 opportunity for the commission of a fraud on the United States, and  
3 (3) being induced to do an act and omit to do an act in violation of  
4 his official duty. In doing so, defendant CONSTANTINE PETER KALLAS  
5 accepted payment of \$20,000 from M.S., an undocumented alien residing  
6 in the United States, in exchange for promising to obtain work  
7 authorization and legal permanent residency status for M.S.

8 At the above time and place, defendant MARIA GABRIELA KALLAS  
9 aided, abetted, counseled, commanded, induced and procured the  
10 commission of the offense alleged above.

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12  
13 A TRUE BILL

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15   
16 Foreperson

17 THOMAS P. O'BRIEN  
18 United States Attorney

19 CHRISTINE C. EWELL  
20 Assistant United States Attorney  
Chief, Criminal Division



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22 SHERI PYM  
23 Assistant United States Attorney  
Chief, Riverside Office

24 RAYMOND O. AGHAIAN  
25 Assistant United States Attorney

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